

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN)
ECF Case

This document relates to:

Horace Morris et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD) (SN)

**THE MORRIS PLAINTIFFS' NOTICE OF MOTION FOR
PARTIAL FINAL JUDGMENT III**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq., ("Goldman Declaration"), along with the exhibits appended, certain plaintiffs in the above-referenced matter who are identified on Exhibit A and Exhibit B to the Goldman Declaration, by and through their counsel, Anderson Kill P.C., respectfully move this Court for an Order:

- (1) awarding the Plaintiffs identified in Exhibit A judgment as to damages in the same amounts previously awarded by this Court to various similarly situated plaintiffs in *Burnett, Havlish, Ashton, Bauer*, and other cases;
- (2) awarding the Estates of the 9/11 Decedents, through the Personal Representative and on behalf of all survivors and all legally entitled beneficiaries and family members of such 9/11 Decedents, as identified by the Plaintiffs set forth on Exhibit B, compensatory damages for pain and suffering in the same per estate amount previously awarded by this Court regarding other estates of decedents killed in the September 11th attacks, as set forth in Exhibit B;
- (3) awarding the Estates of the 9/11 Decedents, through their personal representatives and on behalf of all survivors and all legally entitled beneficiaries and

family members of such 9/11 Decedents, as identified on Exhibit B, an award of economic damages in the amounts as set forth on Exhibit B;

(4) awarding the Plaintiffs identified on Exhibits A and B pre-judgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment for damages;

(5) granting the Plaintiffs identified in Exhibits A and B permission to seek punitive damages, economic damages, and other appropriate damages at a later date;

(6) determining that service of process was properly effected upon the Iran Defendants in accordance with 28 U.S.C. § 1608(a) for sovereign defendants and 28 U.S.C. § 1608(b) for agencies and instrumentalities of sovereign defendants; and,

(7) granting permission for all other plaintiffs in this action not appearing on Exhibits A and/or B to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Plaintiffs' request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on June 21, 2019. *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570, ECF No. 4595.

Respectfully submitted,

/s/ Jerry S. Goldman

ANDERSON KILL P.C.

Jerry S. Goldman, Esq.

Vianny M. Pichardo, Esq.

Bruce E. Strong, Esq.

Stephen Wah, Esq.

1251 Avenue of the Americas

New York, NY 10020

Tel: 212-278-1000

Fax: 212-278-1733

Email: jgoldman@andersonkill.com

vpichardo@andersonkill.com

bstrong@andersonkill.com

swah@andersonkill.com

Attorneys for Plaintiffs

Dated: New York, New York
January 14, 2020